

Arnold & Porter

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MEMO ENDORSED
4/1/25
Apprehension
Granted
RMB

BY ECF

Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Keonne Rodriguez, et al.*, 24 Cr. 82 (RMB)

Dear Judge Berman:

We write on behalf of Keonne Rodriguez, one of the defendants in the above-referenced matter. Mr. Rodriguez's bail conditions currently require home detention. Having conferred with the Government and Pretrial Services, we respectfully request that this requirement be modified to a curfew that is enforced by location monitoring with the applicable hours set by Pretrial Services.

The Government and Pretrial Services both consent to this proposal.

Respectfully submitted,

Michael Kim Krouse

cc: AUSA Andrew Chan
AUSA David Felton
AUSA Cecilia Vogel

